

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No. 1:23-cv-00108-LMB-JFA

**DECLARATION OF DANIEL BITTON IN SUPPORT OF GOOGLE LLC'S  
MOTION TO EXCLUDE THE TESTIMONY OF DR. GORANKA BJEDOV**

I, Daniel Bitton, hereby declare as follows:

1. I am a partner with the law firm Axinn, Veltrop & Harkrider LLP, counsel for Defendant Google LLC ("Google") in this action. I respectfully submit this declaration in support of Google's Motion to Exclude the Testimony of Dr. Goranka Bjedov.

2. This declaration is based upon my personal knowledge and my review of relevant documents in this case, and I am competent to testify to the matters stated herein.

3. Attached to this declaration as Exhibit 1 is a true and correct copy of excerpts from the Expert Report of Dr. Goranka Bjedov on behalf of Plaintiffs in this case, dated July 7, 2025.

4. Attached to this declaration as Exhibit 2 is a true and correct copy of excerpts from the Expert Rebuttal Report of Dr. Goranka Bjedov on behalf of Plaintiffs in this case, dated July 28, 2025.

5. Attached to this declaration as Exhibit 3 is a true and correct copy of excerpts from the Expert Reply Report of Dr. Goranka Bjedov on behalf of Plaintiffs in this case, dated August 11, 2025.

6. Attached to this declaration as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Dr. Goranka Bjedov, expert witness on behalf of Plaintiffs in this case, taken on August 27, 2025.


7. Attached to this declaration as Exhibit 5 is a true and correct copy of excerpts from the Expert Report of Professor Jon Weissman on behalf of Plaintiffs in this case, dated July 7, 2025.

8. Attached to this declaration as Exhibit 6 is a true and correct copy of excerpts from the Expert Rebuttal Report of Professor Jon Weissman on behalf of Plaintiffs in this case, dated July 28, 2025.

9. Attached to this declaration as Exhibit 7 is a true and correct copy of excerpts from the transcript of the deposition of Professor Jon Weissman, expert witness on behalf of Plaintiffs in this case, taken on August 20, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 29th of August, 2025, in San Francisco, California.

  
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Daniel S. Bitton